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11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT

14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 No. CR 2:24-CR-00570-WLH

17 Plaintiff,

18 v.  
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20 CLAIRE PATRICIA HAVILAND, et  
21 al.,  
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23 Defendants.

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20 Plaintiff United States of America, by and through its counsel  
21 of record, the United States Attorney for the Central District of  
22 California and Assistant United States Attorneys Reema M. El-Amamy  
23 and Bruce K. Riordan, provides the following update to the Court  
24 regarding unindicted co-conspirator #1.

1 On or about May 21, 2025, unindicted co-conspirator #1 was  
2 murdered while in state custody.<sup>1</sup> The government had previously  
3 provided information to all defendants' counsel that unindicted co-  
4 conspirator #1 was not a cooperating witness in this matter. This  
5 information is accurate.

6 Government counsel learned about the murder of unindicted co-  
7 conspirator #1 through a press release published the day after his  
8 murder.

9 RESPECTFULLY SUBMITTED,

10 DATED: May 23, 2025

BILAL A. ESSAYLI  
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12 DAVID T. RYAN  
13 Assistant United States Attorney  
Chief, National Security Division

14 /s/ Reema M. El-Amamy  
15 REEMA M. EL-AMAMY  
16 Assistant United States Attorney

17 Attorneys for Plaintiff  
18 UNITED STATES OF AMERICA

27 <sup>1</sup> See <https://www.cdcr.ca.gov/news/2025/05/21/kern-valley-state-prison-officials-investigating-the-death-of-an-incarcerated-person-as-a-homicide-9/>.